ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Dkt. No. 95-116
Telephone Number Portability	)	RM 8535

REPLY COMMENTS OF AT&T CORP.

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October 12, 1995

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SUMMARY

The comments strongly confirm the Commission's tentative conclusion that number portability will benefit telecommunications customers by contributing to the development of local competition. There is broad agreement on the fundamental principles: (i) that number (or service provider) portability promotes local competition and thus is in the public interest; (ii) that number portability should promptly be made available through a permanent, database solution; (iii) that a permanent number portability solution should be administered and paid for in a competitively neutral manner; and (iv) that the Commission should assume a leadership role, while drawing on the expertise of industry and state commissions, in ensuring the development and deployment of a uniform, nationwide portability solution.

In some areas, agreement among the comments is less uniform. These reply comments demonstrate that appropriate Commission policy in these areas is clear. First, the Commission should clearly recognize and affirm the importance of number portability to customers, and adopt according number portability policy. Second, the Commission should eliminate the competitive disadvantages imposed on alternative exchange carriers by current interim number portability arrangements, and should direct the industry to

recommend an appropriate interim database solution and oversee its implementation in several regional trials in 1996. Finally, as with the interim database solution, the Commission should direct the industry to recommend a permanent number portability solution, and ensure that number portability is made widely available to customers in 1997.

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AT&T Corp. ("AT&T") hereby replies to the comments submitted in response to the Commission's Notice of Proposed Rulemaking released July 13, 1995.[1]

The comments strongly confirm the Commission's tentative conclusion (para. 7) that number portability[2] will benefit telecommunications customers by contributing to the development of local competition. There is broad agreement on the fundamental principles that should guide the Commission's number portability policy. The New York PSC, for example, concludes that "service provider portability is essential to meaningful local exchange competition."[3] This

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[1] The parties that have submitted comments are listed in Appendix A hereto, and are referred to by the abbreviations set forth in that Appendix.

[2] As in its Comments, AT&T herein defines number portability as service provider portability, that is, the ability of customers to change local service providers without changing their telephone numbers.

[3] New York PSC, p. 1.

conclusion is supported by the Ohio PUC, which states that "number portability is paramount to the success of introducing competition into the local exchange telephone market"[4] and the Florida PSC, which believes that "number portability not only will provide consumers with more options, but [will] contribute significantly to the development of competition."[5] For its part, the Illinois CC states that "the issue is no longer whether -- but when and how -- to implement number portability."[6]

Industry participants also overwhelmingly support this conclusion. MFS, TCG, TW Comm, and other prospective facilities-based providers that seek to offer local service, agree that number portability will make the development of exchange competition more feasible.[7] Interexchange carriers, such as MCI, contemplating entry into the local services market confirm that "provider portability is critical to the success of local competition."[8] A number of incumbent local exchange carriers also recognize the

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[4] Ohio PUC, p. 1.

[5] Florida PSC, p. 1.

[6] Illinois CC, p. 3 See also California PUC, p. 2; Texas PSC, pp. 2-3.

[7] MFS, p. 2; TCG, p. 3; TW Comm, p. 2; NCTA, p. 2.

[8] MCI, p. 2.

importance of number portability and support its deployment.[9]

There is also broad agreement that, unlike number (or service provider) portability, service and location portability are not as critical to local competition. As TCG explains, neither location nor service portability is "material to the question of a customer's ability to change local service providers without suffering inconvenience or disadvantage,"[10] and thus "neither of these forms of portability has the same potential impact on customer choice and competitive opportunities."[11] As TW Comm further explains, "once service provider portability is implemented, [alternative carriers] will likely be able to deliver location portability (at least within their own service

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[9] See, e.g., BellSouth, p. 4 ("BellSouth accepts as a fundamental proposition that service provider portability, if implemented properly, will indeed facilitate increased competition in the wireline local exchange market.") NYNEX, p. 5; U S West, p. 6. A few commenters suggest that there is some question whether number portability is necessary. The primary concerns raised by these parties are the level of customer demand for this vital network function and the costs that may be incurred to implement it. As shown, in Sections II and IV, infra, neither of these considerations should dissuade the Commission from ensuring the deployment of interim database and permanent number portability solutions.

[10] TCG, p. 6.

[11] Id., pp. 5-6.

areas) and service portability without the need to rely on [the incumbent carrier's] cooperation."[12] Indeed, there is almost universal agreement that location portability could deprive customers of the geographic "value" of the present numbering plan, and presents a variety of billing and administrative problems that diminish its current desirability.[13] For similar reasons, there is widespread agreement that service provider portability should be limited in geographic scope, either to existing rate centers or to numbering plan areas ("NPAs").[14]

The comments also strongly confirm that the Commission should -- and must -- assume a leadership role to ensure that number portability is implemented in a uniform and efficient manner nationwide. If inconsistent number portability standards are adopted in different regions or states, "excessive costs [could be imposed] on those carriers operating nationwide networks."[15] This impact would be especially great for wireless carriers, which would be required to modify and enhance their networks to

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[12] TW Comm, p. 7.

[13] See, e.g., New York PSC, pp. 3-4; Illinois CC, pp. 12-13; Ad Hoc Coalition, p. 14; NCTA, pp. 10-11; TW Comm, p. 8.

[14] Id.

[15] TCG, p. 6.

accommodate multiple solutions in order to support seamless roaming and call origination in regions where a wireless switch serves multiple states; similarly affected would be interexchange carriers, which would be required to make their nationwide networks compatible with all solutions in order to route and terminate calls.[16]

The commenters also recognize, as AT&T demonstrated, that the Commission can rely on the industry's technical expertise in the selection and implementation of a number portability solution. Nearly all commenters suggest that the Commission direct an industry forum to develop and make recommendations on a permanent number portability solution.[17] It is also generally agreed that an inclusive and independent organization such as the Industry Numbering Committee ("INC") would be well-suited to provide guidance.

The comments also make clear that a permanent database solution will best support number portability. A "robust database system" will permit individual carriers to use network address information to perform or otherwise

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[16] See also, U S West, p. 9. Bell Atlantic, p. 10. Due to economies of scale in designing and producing equipment upgrades, vendors have expressed a preference for a single number portability solution rather than multiple solutions.

[17] MFS, p. 6.

provide for their own routing functions, and thus will ensure that no industry participant exercises "bottleneck" control over routing, and will free alternative local service providers from reliance on incumbent networks to terminate calls. Commenters agree that the Commission must act aggressively to identify and order deployment of an appropriate industry Service Management System ("SMS"), if number portability is to be made available in a timely manner.[18] Consistent with goals of competitive neutrality, it is also generally recognized that the cost of this permanent solution must be recovered in a fair manner that does not favor certain industry players over others.[19]

There is also agreement that portability for non-geographic numbers should not delay implementation of number portability for other services. The comments confirm that the market for PCS N00 services is in its infancy and cannot be easily assessed. The comments correctly suggest that the Commission should wait for that market to mature to determine whether and how to implement number portability for these services.[20] The comments also confirm the unique

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[18] See, e.g., AT&T, p. 36, NCTA, p. 10.

[19] See, e.g., New York PSC, p. 10; MCI, p. 20; MFS, pp. 13-14; NCTA, p. 11; SBC, pp. 11-12.

[20] See, e.g., BellSouth, p. 17; USTA, p. 11.

issues that 900 service portability raises, and show that the Commission should address these issues before implementing portability for these services.[21]

I. THE LACK OF NUMBER PORTABILITY WILL MAKE LOCAL COMPETITION LESS LIKELY FOR ALL CUSTOMERS

State commissions, potential alternative exchange carriers, interexchange carriers, and customers agree that lack of number portability dramatically affects customer choice of local service provider. These commenters demonstrate that number portability is not only desirable, but absolutely essential to opportunities for effective exchange competition, because customers local subscribers will be extremely reluctant to consider new suppliers if they have to change their telephone numbers.[22]

The Ohio PUC, for example, concludes that "[t]he inability of a subscriber to retain their current telephone number is a strong deterrent when considering a switch from one local service provider to another" and that lack of number portability "acts as a major competitive disadvantage and barrier to market entry for new entrants."[23] Similarly,

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[21] See, e.g., Bell Atlantic, p. 23; Scherers, pp.3-4; Telemation, p 3.

[22] See, e.g., Florida PSC, p. 4; Illinois CC, p. 3; Ohio PUC, p. 1; New York PSC, p. 1.

[23] Ohio PUC, p. 1.

the Illinois CC concludes that "lack of adequate number portability can be a considerable deterrent to any customer contemplating a switch in local carriers, and can impose significant costs on those customers who do switch."[24] Public utility and service commissions for the states of California, Texas, and New York also recognize the importance of number portability to customers by requiring its availability in various forms.[25]

A host of potential alternative exchange carriers have confirmed these conclusions. MFS states that both its "customer surveys and its actual experience" indicate that "telephone subscribers act as if they own their telephone numbers and are extremely reluctant to change numbers unless absolutely necessary."[26] TW Comm concludes from focus group interviews and surveys that "customers view [] current telephone numbers as a serious deterrent to changing telephone companies,"[27] so much so that "local subscribers are 40% less likely to change telephone service providers if

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[24] See Illinois CC, p. 3.

[25] See California PUC, p. 5 ("If customers must change telephone numbers to change service providers, the incumbent could have an advantage in keeping customers"); Florida PSC, pp. 1, 4; New York PSC, pp. 1-4; Texas PUC, p. 3.

[26] MFS, pp. 2-3.

[27] TW Comm, p. 6-7.

they would have to change telephone numbers."[28] MCI, a carrier that has just recently begun to explore possibilities for facilities-based local service, has determined that "customers attach significant value to retaining their assigned telephone number, [and] lack of portability would deter entry by competitive providers of local service."[29]

Predictably, only a few, large incumbent local exchange carriers question the value of number portability to local subscribers. While acknowledging that portability may offer some benefits, PacBell asserts that the need for number portability has been overstated and that "a lack of number portability can be easily overcome."[30] Ameritech suggests that "customer resistance to changing telephone

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[28] TW Comm, p. 6. CCTA, a leading trade association of cable system operators, states that "without question, service provider portability is critical to the decisions of consumers when considering whether or not to take service from competing providers." CCTA, p. 5.

[29] MCI, p. 2. Sprint, another significant interexchange player, supports "the conclusion that service provider portability for geographic telephone numbers is an important influence on customers' willingness to use a competitive local service provider." Sprint, p. 5 (citing surveys by MCI, MFS, and PacBell).

[30] PacBell, p. 6. This assertion itself acknowledges that lack of full number portability is an obstacle that must be surmounted or "overcome."

numbers can and is being overcome through price, service and quality considerations."[31]

These assertions are untenable. As the Commission notes, virtually every survey yet performed establishes that residential and business customers attach substantial value to their numbers.[32] The conclusions of these surveys have been confirmed by not only potential alternative local service providers, but large consumers of telecommunications services such as GSA.[33] Moreover, the assertion ignores the findings of numerous state commissions and legislatures, which have mandated number portability solutions to promote local competition and to serve local customers.[34]

Moreover, PacBell's own research shows that, at any given price, number portability increases potential market penetration for alternative carriers by 30 to 100% in the business market, and 20 to 50% in the residential

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[31] Ameritech, p. 8. A few other incumbents concede that number portability enhances competition, but maintain that its precise impact on customer choice, and the precise level of customer demand, are not yet clear.

[32] NPRM, para. 22.

[33] See GSA, p. 2 ("The current inability to keep the same number when a customer makes these changes is a major deterrent to the choice among competing local exchange companies.")

[34] See, e.g., California PUC, p. 8; Texas PUC, p. 2-3; New York PSC pp. 1-3.

market.[35] The survey further indicates that 21% of business customers are inclined to choose full-service alternative carriers based on the availability of number portability alone, with no additional economic incentive.[36] Even when discounts are considered, number portability continues to play an important role: the Constat Survey indicates that the availability of number portability increases potential market penetration for full-service alternative carriers by 44% among business customers, assuming they have discounted their services by 15%.[37] All of these findings -- from PacBell's own survey -- indicate that number portability is central, rather than peripheral, to customer choice of local service provider.[38]

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[35] PacBell, p. 3, citing Attachment A, Constat, Inc. Analysis of Potential Local and Access Competition and Interconnection Issues, Final Report, May 1995 ("Attachment A" or "Constat Survey").

[36] PacBell, Attachment A, p. 45. See also Constat Survey, p. 46 ("Even with no discount the potential to lose about one quarter of all businesses exists with number portability.")

[37] Under these circumstances, the Constat Survey finds that the percentage of business customers willing to switch their main lines increases from 25% to 36%. PacBell, Attachment A, p. 33.

[38] PacBell asserts a number of methodological deficiencies in studies conducted on behalf of MFS and MCI. It is sufficient to note that commenters question the methodology of PacBell's survey, see ALTS, p. 7, and that despite their alleged deficiencies both the MFS and MCI

(footnote continued on following page)

II. CURRENT INTERIM ARRANGEMENTS ARE NOT ADEQUATE FOR TRUE TESTS OF LOCAL EXCHANGE COMPETITION AND SHOULD BE REPLACED WITH AN INTERIM DATABASE SOLUTION

A few commenters suggest that current interim portability arrangements -- such as remote call forwarding ("RCF") and flexible direct inward dialing ("Flex-DID") -- are sufficient to promote local competition and should be utilized until such time as a permanent number portability solution is deployed.[39] One commenter goes so far as to suggest that these interim arrangements can be shaped into solutions "sustainable for the long term."[40] These suggestions are wholly untenable.

As AT&T and others demonstrated in their comments,[41] current interim portability arrangements do not afford alternative carriers a meaningful opportunity to compete. Both RCF and Flex-DID force alternative carriers

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surveys, as well as the TW Comm survey, concluded that number portability was important to local subscribers.

[39] See, e.g., NYNEX, p. 20 ("[T]he interim number portability solutions are viable when compared to the current long term solutions"); Bell Atlantic, pp. 4-8. Indeed, the only commenters to suggest that interim arrangements are adequate in their current form are incumbent local exchange carriers, who are substantially less affected by them.

[40] BellSouth, p. 59.

[41] AT&T, pp. 10-15.

to route terminating calls through the incumbent carrier's network, thereby preserving dependence on a bottleneck supplier and increasing costs and time for call completion. The interim arrangements also can diminish transmission quality and network reliability, which are of particular concern to potential new market entrants. In addition, as AT&T and others showed, current arrangements may deprive "ported" customers of certain "vertical" features such as Caller Identification.[42] These problems are exacerbated by pricing structures that impose exorbitant costs on alternative carriers for inferior arrangements.[43]

Nor should the Commission regard the Pacific Bell "Release to Pivot" ("RTP") proposal as a potential permanent solution.[44] Under RTP, signaling messages are forwarded to the previously-serving incumbent end office, which returns signaling messages indicating the correct serving end office

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[42] In this regard, Bell Atlantic's claim that RCF supports all CLASS features for "ported" customers of alternative carriers is incorrect. See Bell Atlantic, pp. 5-6. As numerous commenters -- including state regulatory commissions -- show, RCF is not currently capable of supporting all CLASS features to "ported" customers. In addition, RCF deprives "non-ported" customers of some CLASS features.

[43] AT&T, p. 15. In addition to other instances noted in AT&T's comments, PacBell has recently proposed to offer RCF for a non-recurring charge of $31.75 and a monthly charge of $3.25.

[44] PacBell, p. 19.

to the carrier seeking to terminate the call. RTP does not resolve the fundamental problem posed by current "interim" portability arrangements, because it still requires alternative carriers to rely on the capabilities of the competing, incumbent exchange network. Moreover, RTP causes inefficient use of signaling links, creates the potential for inefficient routing, and will require modification of existing SS7 signaling protocols. There is no reason to choose this inferior arrangement over superior database solutions when network modifications and upgrades will be required in all events.

Instead, the Commission should act to require implementation of an interim database solution. The Commission can achieve this by directing an inclusive industry body to select and recommend an interim database solution by early 1996, and ensure its deployment as soon as possible. Currently, two interim database solutions are being considered. The first, the MCI Metro Carrier Portability Code ("CPC") proposal, provides an effective short-term database solution which reduces impact on existing network infrastructure[45] and is compatible with the optimal permanent database solution. Similar advantages can be obtained with a second solution -- the "Initial LRN"

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[45] AT&T, p. 31; MCI, p. 12.

approach -- recently presented to the Illinois CC.[46] AT&T estimates that 50-70% of the switch development for Initial LRN will be re-usable for permanent LRN, and that virtually all of the SMS database will be reusable. In addition, Initial LRN offers even greater migratability to permanent LRN due to similarities in operations systems, switch translations, and procedures for each of the solutions. With either CPC or Initial LRN as an interim database

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[46] See "Initial LRN/NRA Call Model Architecture," prepared for Illinois CC Number Portability Task Force, September 21, 1995. The Initial (or "interim") LRN solution is a single number portability solution that associates an NPA-NXX with each end office switch that serves "ported" numbers. Under "Initial LRN ", the originating switch will determine that a number has been "ported" and launch a query to a database using existing Advanced Intelligent Network ("AIN") capabilities. The database will return an LRN network address, which will be placed in the "called party" signaling parameter; the original dialed number will be placed the in the "redirecting party" parameter. The call will then be routed to the correct serving end office based on the LRN. At the serving end office, the original called number will be replaced in the called party field, and the call terminated to the proper subscriber. "Initial LRN" minimizes development investment and facilitates a transition to a permanent LRN solution, because it uses existing SS7 parameters, existing network routing mechanisms, and existing AIN 0.1 triggers. In addition, Initial LRN facilitates transition to a permanent LRN solution, because both use the same basic network routing mechanism. Further, "Initial LRN " can be implemented in Intelligent Network ("IN") networks with some IN query development.

solution, the Commission will avoid "excessive costs and double deployment."[47]

The Commission should demonstrate its commitment to full number portability by mandating deployment of interim database solutions such as CPC or Initial LRN in several regional trials in 1996. The "beach-heads" established in these regions will extend immediate benefits to customers and facilitate a migration towards a uniform, nationwide permanent solution, as described in Section IV.

III. LRN IS THE BEST CHOICE FOR A PERMANENT NUMBER PORTABILITY SOLUTION

The comments confirm AT&T's substantive showings that, of the proposed architectures for permanent number portability solutions, the LRN proposal should be adopted. Solutions such as the GTE "portable number" proposal "that require consumers to change to a new phone number defeat the purpose of service provider portability."[48] The New York PSC explains that "one overriding principle in any long-term solution should be that the customer does not have to change his or her telephone number in order to gain the benefits of

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[47] Ameritech, p. 12.

[48] California PUC, p. 6.

service provider portability . . . . Any proposed solution which requires a customer to change his or her number, even if only on a one-time basis ... should be dismissed."[49] The comments also recognize that the proposed GTE solution does not slow number exhaust or promote number conservation,[50] and affords limited implementation flexibility because it requires a nationwide "flash-cut" to number portability.[51]

The comments further confirm AT&T's showings that the US Intelco "split domain" Network Node Address ("NNA") is, among other things, less efficient in use of numbering resources.[52] For example, because each subscriber line or customer network address ("CNA") must have a corresponding NNA, the US Intelco proposal has important limitations when large customers choose to switch local carriers. In this instance, the new carrier will often be required to open a

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[49] New York PSC, pp. 7-8. See MFS, p. 10.

[50] California PUC, p. 6; PCS Prime Co., p. 7.

[51] AT&T, p. 27.

[52] See, e.g., Bell Atlantic, p. 29. US Intelco appears to suggest that its NNA solution can minimize number exhaust through assignment of NNAs to end offices rather than subscriber lines. US Intelco Report of the Seattle Local Area Number Portability Trial. This would appear to conflict with US Intelco's prior presentations of its solution, in which NNAs are associated with individual subscriber lines. In all events, this type of network address assignment would appear functionally equivalent to an LRN addressing scheme.

new NNX (NNA) on its serving switch to provide a unique network address for each subscriber line, and all other carriers will be required to alter switch translations to recognize new network addresses. These numbering and administrative impacts will be an increasing problem if local markets become more competitive, and as large customers -- those most likely and able to switch -- have a broader range of local service options.[53] Other commenters confirm that the NNA solution is unable to support advanced features without cumbersome "workarounds" or additional database queries.[54] In addition, commenters have noted the numerous billing and operations systems problems that the NNA "dual number" approach can cause.[55]

Most important, the comments show broad support for the Location Routing Number ("LRN") proposal as the permanent number portability solution. Commenters affirm

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[53] US Intelco has suggested that re-use of network addresses (NNAs) as customer numbers (CNAs) may relieve some pressure on numbering resources. If numbers are re-used in this way, however, number administration and management is made significantly more difficult as operations, billing, and other support systems for all carriers must account for and correctly identify numbers in two domains for each local subscriber.

[54] NYNEX, Attachment A, p. 3. Indeed, it appears that to offer certain vertical features, these workarounds use an addressing scheme that is functionally equivalent to the addressing scheme used in LRN.

[55] See, e.g., BellSouth, p. 30; US Airwaves, p. 6.

LRN's ability to conserve numbering resources,[56] demonstrate LRN's ability to support advanced features, alternative billing arrangements, and operator services functions,[57] and document LRN's extensive compatibility with existing network infrastructure.[58] Moreover, LRN is consistent with the selection criteria identified by AT&T and other commenters.[59]

Contrary to the Commission's misimpression,[60] LRN can be deployed in both Intelligent Network ("IN") and Advanced Intelligent Network ("AIN") environments. The LRN architecture has been conceived and designed to support both AIN and IN-based networks, and vendors can and will make upgrades available for either network type based on carrier demands.

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[56] See, e.g., BellSouth, p. 29; MCI, p. 16; US Airwaves, p. 6.

[57] See, e.g., BellSouth, p. 28; MCI, p. 16; contrary to NYNEX's assertions LRN is capable of supporting ISDN data services, LIDB queries, and coin phone for calls to "ported" customers, as well as CLASS features such as Automatic Recall and Automatic Callback.

[58] BellSouth, pp. 28- 29; MCI, p. 16.

[59] Among permanent portability solutions, LRN also appears to be uniquely capable of addressing certain number exhaust issues that could arise if all carriers are required to "mirror" incumbent rate centers in assigning customer numbers, and NXXs are shared between carriers (i.e., "pooled").

[60] NPRM, para. 37.

Further, contrary to other suggestions,[61] LRN can support location portability, if the Commission ultimately mandates this feature. While the majority of commenters believe that, at least initially, service provider portability should be implemented only within existing rate centers or NPAs, LRN can adapt to allow a customer to "port" a telephone number to any network address (and location). Evolution to this capability requires only the expansion of the industry SMS to hold additional rating information. Further, as proposed by AT&T, LRN does not raise the billing issues identified by BellSouth.[62] If numbers are made portable only within a rate center, LRN will provide carriers all information necessary to properly rate and bill calls.[63]

ITN has also submitted a number portability proposal. Among other things, the ITN proposal appears to preclude database dips by the next-to-last ("N-1") carrier, require originating carrier queries on calls to "ported"

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[61] See, e.g., Bell Atlantic, p. 15; GTE, p. 19.

[62] See, e.g., BellSouth, p. 24.

[63] If numbers are made portable on an unrestricted geographic basis, recording systems may need to be modified to document network address information as well as called and calling party numbers. This need will almost certainly arise regardless of the portability solution implemented if unrestricted location portability is made available.

customers to obtain calling party number, prevent delivery of the original dialed number to the called party, and require a ten-digit trigger for all switches so that "ported" numbers can be identified. Further, ITN advocates immediate and unrestricted geographic portability, which the vast majority of commenters believe is inadvisable. For these reasons, AT&T believes that the Commission should decline to adopt or conduct trials of the ITN proposal, just as the New York PSC did.

IV. THE COMMISSION SHOULD AGGRESSIVELY PURSUE THE IMPLEMENTATION OF INTERIM AND PERMANENT DATABASE SOLUTIONS BY DATES CERTAIN

Notwithstanding the self-serving suggestions of some commenters that the Commission move slowly and cautiously on implementation of number portability,[64] the Commission must act resolutely to ensure that number portability is made available as soon as reasonably practicable. The divergent interests of incumbent local exchange carriers, potential alternative exchange carriers, cable operators, resellers, and wireless carriers, among others, make it imperative that the Commission lead the industry to consensus and develop a clear and expeditious plan for implementation.

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[64] See, e.g., GTE, p. 2; NYNEX, pp. 6-7.